

## **REMARKS/ARGUMENTS**

Claims 1-2, 7, 8 11-12, 16 and 19 are pending in the present application. Claims 3-6, 9-10, 13-15, 17-18, and 20 are canceled. Claims 1, 2, 7, 8, 11, 12, 16 and 19 are amended. Support for the claim amendments can be found in the as-filed specification on pages 14 and 16-17. No new matter is added. Reconsideration and allowance of the claims is respectfully requested.

Applicants have amended some claims and canceled others. Applicants do not concede that the subject matter encompassed by the earlier presented claims is not patentable over the art cited by the Examiner. Applicants canceled claims in this response solely to facilitate expeditious prosecution of this application. Applicants respectfully reserve the right to pursue the claims as presented prior to this amendment, and additional claims, in one or more continuing applications.

### **I. Examiner Interview**

Applicants thank Examiner Syed for the interview held on June 11, 2008 between the Applicants' representatives and the Examiner. The Examiner and the undersigned attorney discussed the 35 U.S.C. §101 rejection. Applicants have incorporated the Examiner's suggestion regarding claim 16. Applicants address this rejection accordingly. The 35 U.S.C. §103 rejection was also discussed. Examiner Syed indicated further consideration of the claim amendment would be given. No agreement was reached with regard to this rejection.

### **II. 35 U.S.C. § 101**

The Examiner has rejected claims 16 and 18 under 35 U.S.C. § 101 as being directed towards non-statutory subject matter. Applicants have amended claim 16 in accordance with judicial case law and PTO guidelines on claiming computer media-related inventions. Claim 16 is as follows:

16. (Currently Amended) A ~~computer program product in a~~ computer readable storage medium storing executable instructions to be executed by a processor for accessing a database wherein the database comprises a plurality of message tables, wherein each message table in the plurality of message tables comprises data in a particular language and wherein the each message table comprises at least one column identified by a table column ID, the computer program product comprising:

instructions for obtaining the table column ID, in response to receiving a query for the data;

instructions for retrieving a locale ID, wherein the locale ID is stored in a memory in a data processing system, and wherein the locale ID is defined by a user using a structured query language SET statement, and wherein the locale ID is associated with ones of the message tables in the plurality of message table wherein the data is represented in the particular language that corresponds with the locale ID;

instructions for modifying the query by appending the locale ID to the table column ID forming a modified query;  
instructions for processing the modified query; and  
instructions for returning the data identified by the modified query, wherein the data that does not correspond with the locale ID is not returned.

Applicants respectfully request the rejection under 35 U.S.C. § 101 be withdrawn.

Applicants have canceled claim 18. Therefore the rejection with respect to this claim is moot.

### **III. 35 U.S.C. § 103, Obviousness**

The Examiner has rejected claims 1, 2, 5-12, 14-16 and 18-22 under 35 U.S.C. § 103 as obvious over Google Language Tool (hereinafter “*Google*”) in view of Roccaforte (U.S. 6,484,179) (hereinafter “*Roccaforte*”). This rejection is respectfully traversed.

The Examiner states:

As per claims 1, 9, 11, 14, 16, 18, 19, and 20, Google teaches a method in a data processing system for accessing a database containing text message for a plurality of cultural contexts, the method comprising (i.e. The Google language tool is a an online search engine that encompasses the data processing system for accessing a database.) (Page 1): receiving a request from a client to set a cultural context from the plurality of cultural contexts for the database (i.e. On page 1, the search page written in: <any language> clearly illustrates that a client requests a cultural context, which is selecting a language from a plurality of cultural contexts, which are many languages contained in the drop-down field. Furthermore, because the Google site is a search engine, an ordinary person skilled in the art understands that a database resides on the back-end that services the Google language tools site.) (Page 1 ) wherein the database includes a plurality of message tables, wherein messages in the message tables are provided in the plurality of cultural contexts (i.e. Page 1 and 2 clearly teach that the Google Language site is a search engine that contains a database that contains a plurality of message tables, which are the plurality of languages listed on pages 1 and 2. Furthermore, an ordinary person skilled in the art understands that messages are contained in the plurality of message tables and are provided in the plurality of cultural context.) (Pages 1 and 2), and wherein multi-cultural text is stored in separate rows with a message ID and cultural context ID; and responsive to receiving queries from the client (Page 1 indicates that a text field contained in Search for: clearly indicates that this page is responsive to receiving queries from the client) (Page 1), processing the queries using the locale to select a text message in an appropriate cultural context (Page 1 clearly indicates that the locale is the result of the client selecting pages located in <any country>, contained in the search for text field would be the targeted text message, and the query is processed when a client selects the Google Search button.) (Page 1 ) without requiring the queries from the client to include the cultural context (i.e. "Tip: If you typically search only pages in a specific language or languages, you can save this as your default search behavior on the Preference page." The preceding text clearly indicates that a client has an ability to pre-select the cultural context and perform queries.) (Page 1 ).

Google does not explicitly teach the method wherein multi-cultural text is stored in separate rows with a message ID and cultural context ID.

Roccaforte teaches the method wherein multi-cultural text (i.e. data stored) is stored in separate rows (i.e. "Each row in store table 102 contains a unique store-id and information about the particular store that corresponds to the store-id." The preceding text clearly indicates that separate rows are each row) with a message ID (i.e. values) and cultural context ID (i.e. values) (see Figure 1, column 1, lines 62-67; column 2, lines 1-15).

It would have been obvious to a person of ordinary skill in the art at the time of Applicant's invention to modify the teachings of Google with the teachings of Roccaforte to include a method wherein multi-cultural text is stored in separate rows with a message ID and a cultural context ID with the motivation to find efficient techniques in storing data in a relational database. (Roccaforte, Abstract).

Final Office Action dated April 21, 2008, pp. 4-6.

The Examiner bears the burden of establishing a *prima facie* case of obviousness based on prior art when rejecting claims under 35 U.S.C. § 103. *In re Fritch*, 972 F.2d 1260, 23 U.S.P.Q.2d 1780 (Fed. Cir. 1992). The prior art reference (or references when combined) must teach or suggest all the claim limitations. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). In determining obviousness, the scope and content of the prior art are... determined; differences between the prior art and the claims at issue are... ascertained; and the level of ordinary skill in the pertinent art resolved. Against this background the obviousness or non-obviousness of the subject matter is determined. *Graham v. John Deere Co.*, 383 U.S. 1 (1966). Often, it will be necessary for a court to look to interrelated teachings of multiple patents; the effects of demands known to the design community or present in the marketplace; and the background knowledge possessed by a person having ordinary skill in the art, all in order to determine whether there was an apparent reason to combine the known elements in the fashion claimed by the patent at issue. *KSR Int'l. Co. v. Teleflex, Inc.*, No. 04-1350 (U.S. Apr. 30, 2007). Rejections on obviousness grounds cannot be sustained by mere conclusory statements; instead, there must be some articulated reasoning with some rational underpinning to support the legal conclusion of obviousness. *Id.* (citing *In re Kahn*, 441 F.3d 977, 988 (CA Fed. 2006)).

Applicants have canceled claims 3-6, 9-10, 13-15, 18, and 20. Therefore, with respect to those claims this rejection is moot. Applicants have amended claims 1, 11, 16, and 19. The rejection to these claims is respectfully traversed.

**III.A. The combination of reference, considered as a whole, does not suggest or teach the features of claim 1.**

The Examiner fails to state a *prima facie* obviousness rejection against claim 1 because neither *Google* nor *Roccaforte* teaches or suggests each and every feature of claim 1. Amended claim 1 is as follows:

1. A method in a data processing system for accessing a database wherein the database comprises a plurality of message tables, wherein each message table in the plurality of message tables comprises data in a particular language and wherein each message table comprises at least one column identified by a table column ID, the method comprising:

obtaining the table column ID, in response to receiving a query for data;  
retrieving a locale ID, wherein the locale ID is stored in a memory in the data processing system, and wherein the locale ID is defined by the user using a structured query language SET statement, and wherein the locale ID is associated with ones of the message tables in the plurality of message tables wherein the data is represented in the particular language that corresponds with the locale ID;  
modifying the query by appending the locale ID to the table column ID forming a modified query;  
processing the modified query; and  
returning data identified by the modified query, wherein data that does not correspond with the locale ID is not returned.

The proposed combination of the cited references, when considered as a whole, does not teach or suggest the features of claim 1. The Examiner cites to *Google* as teaching the features of claim 1. *Google* teaches a search configuration web page that allows a user to enter a preferred language, in a form, to indicate the user's preference for searching for pages in the specific language indicated. The web page also appears to provide a translation service for translating a result of a search into the language preferred by the user. The Examiner admits, and Applicants agree, that *Google* fails to feature "wherein multicultural text is stored in separate rows with a message ID and a cultural context ID." However, the Examiner asserts that *Roccaforte* makes up for the deficiencies of *Google*. The Examiner cites to the following section of *Roccaforte*:

The larger tables within a star schema are referred to as "fact tables", while the smaller tables are referred to as "dimension tables". FIG. 1 illustrates an exemplary star schema with two dimensions.

Referring to FIG. 1, it illustrates a database 100 that includes tables 102, 104 and 106. Table 102 is named "store" and contains information about each of the stores in which sales may occur. Each row in store table 102 contains a unique store-id and information about the particular store that corresponds to the store-id. Table 104 is named "product" and contains information about each type of product that may be sold in any of the stores. Each row in product table 104 contains a unique product-id and information about the particular product.

Table 106 is named "sale" and contains information about each sale in each of the stores represented in the store table 102. Each row in sale table 106 includes a dollar amount, a store-id to indicate the store at which the sale was made, a product-id to indicate the product sold in the sale, and the date of the sale.

*Roccaforte*, col. 1, lines 62-67, col.2, lines 1-15.

*Roccaforte* describes a method for storing multidimensional data in a relational database management system. The above cited section teaches a database with tables. The tables contain unique IDs in each table row. However, *Roccaforte*, does not teach or suggest “retrieving a locale ID, wherein the locale ID is stored in a memory in the data processing system, and **wherein the locale ID is defined by the user using a structured query language SET statement . . .**” Nowhere does *Roccaforte* teach that the unique ID, as taught in the reference, is defined by a user using a SQL SET statement. Moreover, *Roccaforte* fails to teach the feature “modifying the query by **appending the locale ID to the table column ID forming a modified query.**”

*Roccaforte* fails to make up for the deficiencies of *Google*. Therefore, the proposed combination of references, considered as a whole, fails to teach or suggest each and every feature of the claim 1. Therefore, no *prima facie* obviousness rejection can be stated against the claims. Accordingly, the rejection under 35 USC 103 is overcome.

### **III.B. No Proper Reason Exists To Combine the References in a Manner that Compels the Legal Conclusion that Claim 1 Is Obvious in View of the References**

Additionally, no proper reason exists to combine the references in a manner that compels the legal conclusion that claim 1 is obvious in view of the references. No proper reason to so combine the references exists because the references are completely different from each other. As shown above, the proposed combination of the cited references simply do not teach or suggest the features recited in amended claim 1. *Google* teaches a method of translating a user search criteria that has been entered into a form field. In contrast *Roccaforte* teaches a method for storing data in a relational database management system. A person of ordinary skill could find no reason to combine the references to achieve the invention of claim 1, when the references are considered together as a whole. More importantly, the vast disparities among the references show that one of ordinary skill *could not establish a rational reason to combine the references in a manner that compels the conclusion that claim 1 is obvious* in view of the references considered together as a whole. Accordingly, under the standards of *KSR Int'l.*, the Examiner failed to state a *prima facie* obviousness rejection against claim 1.

### **III.C. Remaining Claims**

Claims 11, 16, and 19 recite similar subject matter with regard to claim 1. Independent claims 11, 16, and 19 are not obvious for the reasons stated above with regard to similarly recited subject matter. Dependent claims 2, 7, 8, 12, and 19 depend from claims 1, 11, 16, and 19. Therefore, dependent claims 2, 7, 8, 12, and 19 are not obvious. Accordingly, the rejection under 35 U.S.C. 103 is overcome.

### **IV. Conclusion**

It is respectfully urged that the subject application is patentable over the cited reference(s) and is now in condition for allowance.

The Examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the Examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

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Respectfully submitted,

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